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January 15, 2003

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Federal Communications Commission
445 12th Street, SW
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Federal Communications Commission
Office of the Secretary

Subject: Input on SID Guidelines

Dear Ms. Walter:

Thank you for allowing us the opportunity to comment on the responsibilities of a SID Administrator. As the MBI Administrator, we follow administration guidelines and actively participate in the modification of those guidelines. Here is a recommendation for an outline of a SID Administration Guidelines along with some sub-bullets of information that should be included in the section that may assist in developing the guidelines.

RECOMMENDED SID ADMINISTRATION GUIDELINES OUTLINE

1. Purpose and Scope
 - a. Purpose of the document
 - b. Define the limitations of coverage of the guidelines
2. Background
 - a. Outline how SIDs were created and their use
 - b. Describe why SID Administration is required now
3. SID Format
 - a. Describe the format of a SID
 - b. Describe the difference between a SID and a BID (Billing Identifier)
4. Assumptions and Constraints
 - a. Define the entities involved (the administrators, applicants, and FCC where applicable)
 - b. Define the charging mechanism
5. Criteria for SID Assignment
 - a. SID conservation principles
 - b. Determine entities that can request SIDs
 - c. Determine whether a SID can be transferred between assignees
 - d. Define the supporting information which must accompany an application
 - e. Define the scope of a SID assignment
6. Responsibilities of SID Applicants
 - a. Define the records that must be kept by the applicant

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- b. Define the circumstances that an applicant must notify the administrator of a change
 - c. Define whether an applicant should participate in an audit if required
- 7. Responsibilities of the SID Administrators
 - a. Define the service levels which **an** administrator must operate under (for instance, the timeframe from when an application is submitted to when an assignment should be made)
 - b. Determine whether the administrators should participate in any related activities such as guideline changes
 - c. Specify that applications should be treated confidentially
 - d. Specify the reporting requirements that are necessary
- 8. Coordination Responsibilities Between SID Administrators
 - a. Determine the manner that multiple SID administrators must interact together
- 9. Appeals Process
 - a. Determine the process for appealing a denied application
- 10. Reclamation Process
 - a. Determine the process that both the administrator and the applicant must take in reclaiming an unused or improperly used SID
- 11. Guidelines Maintenance Process
 - a. Determine how the guidelines should be updated as processes are changed

Should you have any comments or questions on this submission please feel free to contact me at 703-435-8255.

Sincerely,

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